

### REMARKS

The Examiner rejects claims 1 and 2 under 35 U.S.C. 103(a) as being unpatentable over Saliba (5,883,864). Reconsideration is respectfully requested in view of the following remarks.

The Saliba reference relied upon by the examiner is completely different from the applicants' invention. The following language from Saliba so demonstrates. In Saliba, "Summary of the Invention with Objects" states:

*"A general object of the present invention is to improve performance of storage medium changer devices, such as tape cartridge loader units.*

*Another general object of the present invention is to enable assembly of a media library by adding additional media loader units and thereby provide storage scalability.*

*One more object of the present invention is to minimize physical movement of a media unit to a player within a media library by determining a closest available player and vectoring a logical device address to the player."*

For these purposes, as best shown in Fig. 5 of the Saliba patent, the data storage unit has a plurality of tape cartridge magazine slots 112 are stacked one on top of the other. The magazine slots 112 are divided into a plurality of magazines 156A-156F. Corresponding to the magazines 156A-156F, a plurality of drivers 148-10 to 148-15 is associated thereto, respectively. Here, it should be noted that, as indicated in the specification, *"In the example of FIG. 4, there are three tape cartridge magazines 156A, 156B and 156C associated with loader unit 100A. Each magazine effectively defines an access zone which is established in relation to a particular drive. For example, the slots of magazine 156A are physically closest to physical drive 148-1; the slots of magazine 156B are physically closest to physical drive 148-2; and, the slots of magazine 156C are*

*physically closest to physical drive 148-3." (Column 10, lines 15-18).* This means that each drive is associated with physically/geometrically closest magazines, but not logically associated.

In contrast thereto, the library system of the present invention employs "virtual units." The system divides the loader (library) into a plurality of small loaders (libraries), causing the host computer to virtually recognize each divided loader as being independent from other loaders (see FIGS. 2 and 3 of the present application). As shown in FIGS. 6 and 7 of the present application, this further allows that, for the library system with a plurality of units, the virtual library unit can be constituted using elements in different units. For example, the virtual unit 60<sub>0</sub> is constituted of elements in different library units 52<sub>0</sub> and 52<sub>1</sub>.

It is respectfully noted that Applicants' claims 1 and 2 both recite this virtual units configuration that is not found in Saliba. In view of this recited difference, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-0750, under Order No. 9694-000002/US from which the undersigned is authorized to draw.

Dated: October 14, 2005

Respectfully submitted,

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